THERICS, INC. 115 CAMPUS DRIVE PRINCETON, NJ 08540

MAR - 9 2004



PRINCETON, NJ 08540 TELEPHONE: 609-514-7200 FAX: 609-514-7219

E-MAIL: therics@therics.com

### 510(k) SUMMARY

## Therics' TheriLink<sup>TM</sup> Bone Void Filler

Submitter's Name, Address, Telephone Number, Contact Person and Date Prepared

#### Submitter's Name:

Umberto V. Parrotta

Telephone: 609.514.7237 or 609.514.7200 (main)

Facsimile: 609.514.7219

Contact Person: Umberto V. Parrotta

Date Prepared: January 19, 2004

# Name of Device and Name/Address of Sponsor

## TRADE/PROPRIETARY NAME OF DEVICE:

TheriLink<sup>TM</sup> Bone Void Filler

#### ADDRESS:

115 Campus Drive Princeton, New Jersey 08540

#### Common or Usual Name:

Bone Void Filler.

Synthetic Bone Void Filler.

Synthetic Cancellous Bone Void Filler.

Bone Graft Substitute.

Synthetic Bone Substitute.

Synthetic Cancellous Bone Substitute

#### **Classification Name**

Bone Void Filler

#### **Predicate Devices**

Therics' TheriFil<sup>TM</sup> Bone Void Filler Orthovita's Vitoss<sup>TM</sup>

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## Intended Use / Indications for Use

TheriLink<sup>TM</sup> Bone Void Filler is indicated for use in filling the gaps or voids of osseous defects surgically created or resulting from trauma and intended for treatment of osseous defects not intrinsic to the stability of the bone structure. The product is intended for use in defects of the skeletal system (i.e. the extremities, spine and pelvis). TheriLink<sup>TM</sup> parts create a network within the defect site that resorbs during healing and is replaced by bone.

# Technological Characteristics and Substantial Equivalence

The TheriLink<sup>TM</sup> Bone Void Filler is constructed of synthetic  $\beta$ -tricalcium phosphate ( $\beta$ -TCP), a commonly found mineral in bone. The porosity and geometric features of  $\beta$ -tricalcium phosphate create a network within the defect site that resorbs during healing and is replaced by native bone.

A summary of the physical and chemical characteristics of both TheriLink<sup>TM</sup> and TheriFil<sup>TM</sup> is below in Table 1.

Table 1. Physical and chemical characteristics of the TheriLink  $^{TM}$  and TheriFil $^{TM}$ .

Characteristic Porosity (%)		TheriLink <sup>TM</sup>	<b>TheriFil<sup>™</sup></b> 59 ± 5.3
		$58 \pm 2.2$	
Pore Area (µm²)	Mean	2500 <u>+</u> 900	$3000 \pm 1200$
	Min*	40	40
	Max	$4.9 \times 10^5 \pm 1.9 \times 10^5$	$3.5 \times 10^5 \pm 2.1 \times 10^5$
	Mean	55 ± 11	60 ± 12
	Min*	7	7
	Max	$770 \pm 170$	$640 \pm 220$
True Density (grams/mL)		1.5	1.5
Crystallinity		β-TCP > 75%	β-TCP > 75%

Percent porosity and pore area ( $\mu m^2$ ) were estimated using SEM images (n = 18) and are described in **Attachment - 13A**, **Porosity Characterization**. Data are shown as ave  $\pm$  stdev. The pore diameter was estimated from the pore area by assuming circular shaped pores. \*All finite (< 40  $\mu m^2$ ) pore structures were excluded from the analysis and therefore the minimum pore area is represented by  $40\mu m^2$  and the pore diameter by 7 $\mu$ m. The true density was measured using a pycnometer.

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The risk assessment comparing the design of TheriLink<sup>TM</sup> to TheriFil<sup>TM</sup> indicates minimal additional risk inherent to the design, appearing consistent with similar FDA cleared and marketed products (i.e. Orthovita's Vitoss<sup>TM</sup>).

The TheriLink<sup>TM</sup> implants have the same intended use and indications, the same or similar principals of operation and technological characteristics, and equivalent performance or characteristics in appropriate bench studies, and risk assessment. Therefore, Theric's Therilink<sup>TM</sup> Bone Void Filler is substantially equivalent to the predicate device.



MAR - 9 2004

Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

Therics, Inc. C/o Jonathan S. Kahan Hogan & Hartson, LLP 555 13<sup>th</sup> St. NW Washington, DC 20004

Re: K040134

Trade/Device Name: TheriLink™ Bone Void Filler

Regulation Number: 21 CFR 888.3045

Regulation Name: Resorbable calcium salt bone void filler

Regulatory Class: II Product Code: MQV Dated: January 21, 2004 Received: February 9, 2004

Dear Mr. Kahan:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (301) 594-4659. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address <a href="http://www.fda.gov/cdrh/dsma/dsmamain.html">http://www.fda.gov/cdrh/dsma/dsmamain.html</a>

Sincerely yours,

Celia M. Witten, PhD, MD

Director

Division of General, Restorative and Neurological Devices Office of Device Evaluation Center for Devices and Radiological Health

Mulhar Miller

Enclosure



# **CONFIDENTIAL**

# Attachment – 11

Indications for Use Form					
510(k) Numbe	er (if known):				
Device Name:	TheriLink™ Bor	ne Void Filler			
Indications for	TheriLink™ Borvoids of osseous intended for trea bone structure. System (i.e., the	defects surgically of tment of osseous do The product is inter extremities, spine a	dicated for use in filling the gaps or created or resulting from trauma and efects not intrinsic to the stability of the ided for use in defects of the skeletal and pelvis). TheriLink <sup>TM</sup> parts create a esorbs during healing and is replaced		
Prescription U (Part 21 CFR	fse <u>√</u> 801 Subpart D)	AND/OR	Over-The-Counter Use(21 CFR 807 Subpart C)		
(PLEASE DO	NOT WRITE BELO	OW THIS LINE-CONT	TINUE ON ANOTHER PAGE IF NEEDED)		
	Concurrence of	CDRH, Office of D	Device Evaluation (ODE)		
		ision Sign-Off) sion of General Neurological D	I, Restorative,		
	"†A(	Namher	K040134		